

EXHIBIT A

COURT OF COMMON PLEAS OF
INDIANA COUNTY, PENNSYLVANIA

INDIANA COUNTY
NOT HONORABLE
CLERK OF COURT

2012 JAN 11 P 3 47

FILED

NOAH CHURA,

Plaintiff

v.

AFNI, INC.,

Defendant

CASE NO.

CIVIL ACTION

10046 CD 2012

To: Defendant

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES

**THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A
REDUCED FEE OR NO FEE.**

COURT ADMINISTRATOR'S OFFICE
4TH FLOOR, INDIANA COUNTY COURTHOUSE
INDIANA, PENNSYLVANIA 15701
(724) 465-3955

COURT OF COMMON PLEAS OF
INDIANA COUNTY, PENNSYLVANIA

NOAH CHURA,

Plaintiff

v.

AFNI, INC.,

Defendant

CASE NO.

CIVIL ACTION

Complaint With Jury Demand

Now comes the Plaintiff, by and through his attorneys, Michael N. Vaporis and Katrina M. Kayden, and demanding a trial by jury in this action, pleads as follows.

1. The Plaintiff is an individual residing at 410 Poplar Avenue, Indiana, Pennsylvania 15701.

2. The Defendant is a foreign corporation with its headquarters located at 404 Brock Drive, Bloomington, Illinois 61701.

3. On or before April 10, 2010, the Plaintiff received from the Defendant a demand for payment of a debt for \$45.69, for which the Defendant was willing to accept payment in full for \$25.

4. The Defendant is a debt collector, and the demand for payment stated that the original creditor was "Verizon Pennsylvania Inc." A copy of the demand for payment is attached as Exhibit 1.

5. On May 18, 2010 the Defendant sent another demand for payment, a copy of which is attached as Exhibit 2, this time claiming that the debt was \$185.15, but still stating that they would accept \$25 as payment in full.

6. On May 21, 2010, the Defendant sent a third demand for payment, a copy of which is attached as Exhibit 3, now stating that the current balance was \$400, but still stating that they would accept \$25 as payment in full.

7. On July 2, 2011, the Defendant sent out a fourth demand for payment, a copy of which is attached as Exhibit 4, repeating the amount and offer of the third demand.

8. The Plaintiff did not owe the Defendant, or Verizon Pennsylvania Inc., anything on the date of the demand letters, or now.

9. In the alternative, both the debt, and any last payment, were made more than four years before the demand letters were sent, and thus the debts are barred by the statute of limitations.

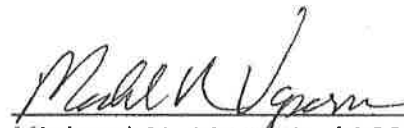
10. The Defendant knowingly and/or negligently demanded payment of a debt which it knew, or should have known, was no longer valid and barred by the statute of limitations.

11. The actions of the Defendant are in violation of the Fair Debt Collection Practices Act, 15 USC §1692, et seq., for which the Plaintiff seeks all damages and relief provided.

12. The actions of the Defendant, as set out above, are a violation of the Fair Credit Extension Uniformity Act, 73 PS§2270.1 et seq., and the Unfair Trade Practices and Consumer Protection Law, for which the Plaintiff seeks all the damages and relief provided by said act.

Wherefore, the Plaintiff prays for judgement against the Defendant, in an amount less than fifty thousand dollars, plus interest and costs, to recover for which this suit is brought.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael N. Vaporis", is written over a horizontal line.

Michael N. Vaporis (46333)
Katrina M. Kayden (204563)
Law Offices of Michael N. Vaporis
840 Philadelphia Street #301
Indiana, Pennsylvania 15701
(724) 465-5653
Attorneys for the Plaintiff



Afni, Inc.
404 Brock Drive
PO Box 3427
Bloomington, IL 61702-3427
(866)307-0283
www.afnicollections.com

DISCOUNTED PAYMENT OFFER

We are making another attempt to contact you regarding your overdue account. In an effort to resolve this matter we will accept **\$25.00**. Once paid, our records will reflect the status of your account with Afni, Inc. as settled in full.

If you have any questions, please contact our office toll free at (866)307-0283 Monday through Friday 7am - 9pm CT. For proper credit on your account please write this number 030771721-02 on your payment.

To manage your account online, visit us at www.afnicollections.com. You can login with your account number and last 4 digits of your Social Security number. You can pay securely online using your debit card, Visa®, MasterCard®, or checking account and have your receipt available online once your payment posts.

Credit card payments by mail are also accepted. Credit card payment options are located on the back of the payment stub located at the bottom of this letter and can be mailed back inside the enclosed envelope.

Don't miss this opportunity to settle this account for **\$25.00!**

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This letter is from a debt collector.

Please retain this information for your records

Afni, Inc. Account #	Original Creditor	Current Balance	Settlement Offer	Letter Date
030771721-02	VERIZON INC.	\$45.69	\$25.00	4/10/2010

Detach along perforation and return bottom portion along with payment in the enclosed envelope. For proper credit, please include your Afni account # listed below on your check.



Make check payable to Afni, Inc. Credit card payment options are on the back of notice.



AFN23

PO BOX 223721
DALLAS, TX 75222



0100131897

Afni, Inc. Account #: 030771721-02
Toll Free #: (866)307-0283
Letter Date: 4/10/2010
Original Creditor: Verizon Pennsylvania Inc.
Current Balance: \$45.69
Settlement Offer: \$25.00

Electronic Service Requested

7 02030771721 991730 4569



*****AUTO**SCH 3-DIGIT 155
NOAH CHURA
970 LILAC ST APT 4
INDIANA, PA 15701-3338

131897
T65 P2

PO Box 3427
Bloomington, IL 61702-3427





Afni, Inc.
404 Brock Drive
PO Box 3427
Bloomington, IL 61702-3427
(866)307-0283
www.afnicollections.com

DISCOUNTED PAYMENT OFFER

We are making another attempt to contact you regarding your overdue account. In an effort to resolve this matter we will accept **\$25.00**. Once paid, our records will reflect the status of your account with Afni, Inc. as settled in full.

If you have any questions, please contact our office toll free at (866)307-0283 Monday through Friday 7am - 9pm CT. For proper credit on your account please write this number 030771720-02 on your payment.

To manage your account online, visit us at www.afnicollections.com. You can login with your account number and last 4 digits of your Social Security number. You can pay securely online using your debit card, Visa®, MasterCard®, or checking account and have your receipt available online once your payment posts.

Credit card payments by mail are also accepted. Credit card payment options are located on the back of the payment stub located at the bottom of this letter and can be mailed back inside the enclosed envelope.

Don't miss this opportunity to settle this account for **\$25.00!**

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This letter is from a debt collector.

Please retain this information for your records

Afni, Inc. Account #	Original Creditor	Current Balance	Settlement Offer	Letter Date
030771720-02	VERIZON INC.	\$185.15	\$25.00	5/18/2010

Detach along perforation and return bottom portion along with payment in the enclosed envelope. For proper credit, please include your Afni account # listed below on your check.



Make check payable to Afni, Inc. Credit card payment options are on the back of notice.



AFN23

PO BOX 223721
DALLAS, TX 75222



0138419313

Electronic Service Requested

Afni, Inc. Account #: 030771720-02
Toll Free #: (866)307-0283
Letter Date: 5/18/2010
Original Creditor: Verizon Pennsylvania Inc.
Current Balance: \$185.15
Settlement Offer: \$25.00

02030771720 991730 18515



*****AUTO**SCH 3-DIGIT 155
NOAH CHURA
970 LILAC ST APT 4
INDIANA, PA 15701-3338

419313
T248 P1

PO Box 3427
Bloomington, IL 61702-3427





Afni, Inc.
404 Brock Drive
PO Box 3427
Bloomington, IL 61702-3427
(866)307-0283
www.afnicollections.com

DISCOUNTED PAYMENT OFFER

We are making another attempt to contact you regarding your overdue account. In an effort to resolve this matter we will accept **\$25.00**. Once paid, our records will reflect the status of your account with Afni, Inc. as settled in full.

If you have any questions, please contact our office toll free at (866)307-0283 Monday through Friday 7am - 9pm CT. For proper credit on your account please write this number 018628638-02 on your payment.

To manage your account online, visit us at www.afnicollections.com. You can login with your account number and last 4 digits of your Social Security number. You can pay securely online using your debit card, Visa®, MasterCard®, or checking account and have your receipt available online once your payment posts.

Credit card payments by mail are also accepted. Credit card payment options are located on the back of the payment stub located at the bottom of this letter and can be mailed back inside the enclosed envelope.

Don't miss this opportunity to settle this account for **\$25.00!**

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This letter is from a debt collector.

Please retain this information for your records

Afni, Inc. Account #	Original Creditor	Current Balance	Settlement Offer	Letter Date
018628638-02	VERIZON	\$400.00	\$25.00	5/21/2010

Detach along perforation and return bottom portion along with payment in the enclosed envelope. For proper credit, please include your Afni account # listed below on your check.



Make check payable to Afni, Inc. Credit card payment options are on the back of notice.



AFNZ3

PO BOX 223721
DALLAS, TX 75222



0141176302

Afni, Inc. Account #: 018628638-02
Toll Free #: (866)307-0283
Letter Date: 5/21/2010
Original Creditor: Verizon Pennsylvania Inc.
Current Balance: \$400.00
Settlement Offer: \$25.00

Electronic Service Requested

3 02018628638 991400 40000

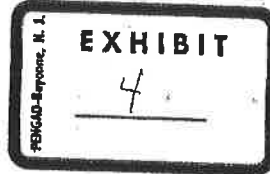


*****AUTO**ALL FOR AADC 150
NOAH CHURA
970 LILAC ST APT 4
INDIANA, PA 15701-3338

176302
T184 P1

PO Box 3427
Bloomington, IL 61702-3427





Afni, Inc.
1310 MLK Drive
PO Box 3427
Bloomington, IL 61702-3427
(866) 307-0283
www.afnicollections.com

DISCOUNTED PAYMENT OFFER

We are making another attempt to contact you regarding your overdue account. In an effort to resolve this matter we will accept **\$25.00**. Once paid, our records will reflect the status of your account with Afni, Inc. as closed as settled.

This offer is valid until 8/16/2011. Afni is not obligated to renew this offer.

If you have any questions, please contact our office toll free at (866) 307-0283 Monday through Friday 7am - 9pm CT. For proper credit on your account please write this number 018628638-02 on your payment.

To manage your account online, visit us at www.afnicollections.com. You can login with your account number and last 4 digits of your Social Security number. You can pay securely online using your debit card, Visa®, MasterCard®, or checking account and have your receipt available online once your payment posts.

Credit card payments by mail are also accepted. Credit card payment options are located on the back of the payment stub located at the bottom of this letter and can be mailed back inside the enclosed envelope.

Don't miss this opportunity to settle this account for **\$25.00!**

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This letter is from a debt collector.

Please retain this information for your records

Afni, Inc. Account #	Original Creditor	Current Balance	Settlement Offer	Letter Date
018628638-02	VERIZON	\$400.00	\$25.00	07/02/2011

Detach along perforation and return bottom portion along with payment in the enclosed envelope. For proper credit, please include your Afni account # listed below on your check.



Make check payable to Afni, Inc. Credit card payment options are on the back of notice.



AFN23

PO BOX 223721
DALLAS, TX 75222



1183133417

Electronic Service Requested

Afni, Inc. Account #: 018628638-02
Toll Free #: (866) 307-0283
Letter Date: 07/02/2011
Original Creditor: Verizon Pennsylvania Inc.
Current Balance: \$400.00
Settlement Offer: \$25.00

3 02018628638 991400 40000



*****AUTO**ALL FOR AADC 150
NOAH CHURA
410 POPLAR AVE
INDIANA, PA 15701-3089

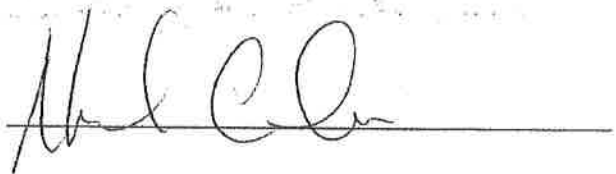
133417
T147 P1

PO Box 3427
Bloomington, IL 61702-3427



VERIFICATION

I verify that the statements made in the foregoing true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S.A. §4904 relating to unsworn falsification to authorities.

A handwritten signature in dark ink, appearing to be "H. L. C. L.", is written over a horizontal line.